

Eric M. Creizman

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**MEMO ENDORSED**

The Application is granted.

SO ORDERED:

  
 Paul G. Gardephe, U.S.D.J.

Dated: August 20, 2020

August 19, 2020

*By ECF and Email*

The Honorable Paul G. Gardephe  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

**Re: SEC v. John A. Paulsen, 18-CV-6718 (PGG) (SDNY)**

Dear Judge Gardephe:

I am writing to respectfully request that the Court grant an extension of time for me to file John Paulsen's post-trial submissions *nunc pro tunc* from Friday, August 14, 2020 to Tuesday, August 18, 2020. As the Court is aware, I filed Mr. Paulsen's Post-Trial Memorandum yesterday. Due to my personal and professional obligations, I simply was unable to effectively complete a final draft in time for the deadline, notwithstanding my sincere efforts to do so.

Out of fairness to the SEC, I neither reviewed the SEC's initial post-trial submissions until after I filed Mr. Paulsen's post-trial submission, nor did anyone who assisted me with respect to the trial. In addition, I did not disseminate the SEC's initial post-trial submissions to Mr. Paulsen until I filed Mr. Paulsen's post-trial submission.

I have conferred with counsel for the SEC, which does not oppose my application for a *nunc pro tunc* extension. Out of fairness to the SEC—although they have not asked me to do so—I will commit to filing Mr. Paulsen reply to the SEC's post-trial submission on August 26, 2020, two business days earlier than the August 28, 2020 deadline for reply post-trial submission.

In addition, I respectfully request that the Court permit me to file an amended Post-Trial Memorandum, simply corrects non-substantive, typographical errors in the version filed

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yesterday. I have attached to this letter as Exhibit A a redline showing the changes from the Post-Trial Memorandum, dated August 18, 2020, that would appear in the Corrected Post-Trial Memorandum I will file if this motion is granted.

I thank the Court for its consideration in this matter.

Respectfully,

/s/ Eric M. Creizman  
Eric M. Creizman

cc: Alyssa Qualls, Esq., John Birkenheier, Esq., Brian Fagel, Esq., Eric Celauro, Esq. (by ECF and email).